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Jun 05 2023

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

The Honorable Kristi F. Curtis, Circuit Court Judge

Appellate Case No.: 2022-001175

Hunsten B. Ragin as Personal Representative of the Estate of Samel
Ragin.....Appellant,

v.

Pilgrim’s Pride Corporation, Mary McBride, and Susan Jones.....Respondent.

**CONSENT MOTION FOR EXTENSION OF TIME
TO FILE RESPONDENTS’ FINAL BRIEF**

By letter from the Court of Appeals dated May 25, 2023, Respondent was instructed to file and serve its Final Brief, together with Motion Requesting Extension to File Final Brief outside of the filing deadlines set by Rule 211 of the South Carolina Appellate Court Rules, within ten (10) days of receipt.

Respondents respectfully request that they be granted a ten (10) day extension to file their Final Brief, making the Respondents’ Final Brief due on or before June 5, 2023.

This Motion is being submitted with the express consent of Counsel for the Appellant to Respondents’ request for a ten (10) day extension.

WE SO MOVE:

VERNIS & BOWLING OF SOUTH CAROLINA, LLC

s/Thomas B. Pritchard
Thomas B. Pritchard (SC Bar No.: 65006)
2711 Middleburg Drive, Suite 216
Columbia, SC 29204
Tel.: (803) 234-5416
Email: tpritchard@scarolina-law.com

WE SO CONSENT:

PARKER LAW GROUP, LLC

s/Neil E. Alger
Neil E. Alger
John E. Parker, Jr.
690 N. Green Street
Ridgeland, SC 29936
Tel.: (843) 547-8025
Email: nalger@parkerlawgroupsc.com
jayparker@parkerlawgroupsc.com

-AND-

Dwight C. Moore
Moore Law Firm, LLC
P.O. Box 1229
Sumter, SC 29151-1229

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Ragin.....Appellant,

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CERTIFICATE OF SERVICE

This is to certify that the **Motion For Extension of Time to File Final Brief of Respondents**, to which this certificate is affixed, was served upon all parties to this action by hand delivery, by depositing a copy of same, enclosed in a first-class, post-paid envelope, addressed to the attorneys of record, or by other means as permitted by Appellate Court Rules as follows:

Neil E. Alger
John E. Parker, Jr.
PARKER LAW GROUP, LLC
690 N. Green Street
Ridgeland, SC 29936
Tel.: (843) 547-8025
nalger@parkerlawgroupsc.com
jayparker@parkerlawgroupsc.com

-AND-

Dwight C. Moore
MOORE LAW FIRM, LLC
P.O. Box 1229
Sumter, SC 29151-1229

s/Thomas B. Pritchard
Thomas B. Pritchard (SC Bar No.: 65006)
VERNIS & BOWLING OF SOUTH CAROLINA, LLC
494-A Savannah Highway
Charleston, SC 29407
(843) 242-7805
tpritchard@scarolina-law.com

June 5, 2023
Charleston, South Carolina

VERNIS & BOWLING

ATTORNEYS AT LAW • EST. 1970

2711 Middleburg Drive, Suite 216, Columbia, South Carolina 29204 • Telephone: 803-234-5416 • Facsimile: 803-978-6246

Thomas B. Pritchard
tpritchard@scarolina-law.com
Michael F. McCusker
mmccusker@scarolina-law.com

June 5, 2023

Via Electronic Mail Only

Jenny Abbott Kitchings, Clerk of Court
Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

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Jun 05 2023

SC Court of Appeals

Re: Hunsten B. Ragin as Personal Representative of the Estate of Samel Ragin vs. Pilgrim's Pride Corporation, Mary McBride, and Susan Jones
Court of Appeals Case No.: 2022-001175
Civil Case No.: 2021-CP-43-00307
V&B File Number: 1485-21035

Dear Ms. Kitchings:

As you are aware, we represent Respondents Pilgrim's Pride Corporation, Mary McBride, and Susan Jones in regard to the above-referenced matter. Enclosed for filing with the Court, please find Respondents' Final Brief and Motion for Extension of Time to File Respondents' Final Brief, each with an appropriate Certificate of Service. By copy of same to all counsel, they are also being served with a copy of same. In addition, our firm's check will go out in tomorrow's mail for the filing of same.

Please let us know if you have any questions or need any additional information.

With highest regards,

/s/ Thomas Pritchard

Thomas B. Pritchard

TBP/mfm
Enclosures

cc: Neil E. Alger, Esquire
John E. "Jay" Parker, Jr., Esquire
Dwight C. Moore, Esquire

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